



366666



"Winters, Karen"  
<KWinters@ssd.com>  
06/30/2006 07:01 AM

To Jason.Barbeau@usdoj.gov, Alan.Tenenbaum@usdoj.gov,  
Catherine Garypie/R5/USEPA/US@EPA  
cc  
bcc

Subject RE: Exhibit B

Thanks very much. Bob Reichel has his people lined up to execute the Settlement Agreement tomorrow, so if you could give this your attention first thing tomorrow, that would be most appreciated. I don't think you'll have a problem with the suggested revisions. Again, thanks.

-----Original Message-----

From: Jason.Barbeau@usdoj.gov [mailto:Jason.Barbeau@usdoj.gov]  
Sent: Thursday, June 29, 2006 6:28 PM  
To: Alan.Tenenbaum@usdoj.gov; Garypie.Catherine@epamail.epa.gov;  
Winters, Karen  
Subject: Re: Exhibit B

We will have to respond first thing tomorrow morning.

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Sent from my BlackBerry Wireless Handheld

Sent Using U.S. DOJ/ENRD BES Server

-----Original Message-----

From: KWinters@ssd.com <KWinters@ssd.com>  
To: Barbeau, Jason (ENRD) <JBarbeau@ENRD.USDOJ.GOV>; Tenenbaum, Alan (ENRD) <ATenenba@ENRD.USDOJ.GOV>; Garypie.Catherine@epamail.epa.gov <Garypie.Catherine@epamail.epa.gov>  
Sent: Thu Jun 29 18:18:43 2006  
Subject: FW: Exhibit B

Are you planning on looking at this yet this evening?

-----Original Message-----

From: Winters, Karen  
Sent: Thursday, June 29, 2006 5:55 PM  
To: 'Jason.Barbeau@usdoj.gov'; Garypie.Catherine@epamail.epa.gov;  
Alan.Tenenbaum@usdoj.gov  
Subject: FW: Exhibit B

Sorry about that. Attached is my redline of the version of Exhibit B that Brian Monroe circulated yesterday. Bob didn't like the suggested revisions to the last bullet under the River Rouge Site Investigation, so I'm planning to reinclude the original language. Again, sorry about the oversight. You can see that it's what we talked about earlier this afternoon. Please let me know if you have any concerns about suggested deletions (which are the same for each of the sites) and I will send the execution copy out.

-----Original Message-----

From: Jason.Barbeau@usdoj.gov [mailto:Jason.Barbeau@usdoj.gov]  
Sent: Thursday, June 29, 2006 5:38 PM  
To: Winters, Karen  
Cc: Alan.Tenenbaum@usdoj.gov; Garypie.Catherine@epamail.epa.gov  
Subject: RE: Exhibit B

We haven't seen any version today. Can you please send us the latest version for our review? Thanks.

-----Original Message-----

From: KWinters@ssd.com [mailto:KWinters@ssd.com]  
Sent: Thursday, June 29, 2006 5:34 PM  
To: Barbeau, Jason (ENRD)  
Cc: Tenenbaum, Alan (ENRD); Garypie.Catherine@epamail.epa.gov  
Subject: RE: Exhibit B

I got a call from Bob Reichel indicating that with the changes he gave me this afternoon (which I incorporated) he's fine. I'd like to circulate the execution copy yet this evening.

-----Original Message-----

From: Jason.Barbeau@usdoj.gov [mailto:Jason.Barbeau@usdoj.gov]  
Sent: Thursday, June 29, 2006 5:30 PM  
To: Winters, Karen  
Cc: Garypie.Catherine@epamail.epa.gov; Alan.Tenenbaum@usdoj.gov  
Subject: RE: Exhibit B

Karen,

That's good news on the 4(c) language. Catherine and I will need to check in with MI and get back to you - tonight or first thing tomorrow.

-----Original Message-----

From: KWinters@ssd.com [mailto:KWinters@ssd.com]  
Sent: Thursday, June 29, 2006 5:10 PM  
To: Barbeau, Jason (ENRD); PBrooks@ssd.com  
Subject: RE: Exhibit B

Jason-are you OK with these? Everyone else is. Also, we will delete the language in 4(c) re consent being unreasonably withheld etc.

-----Original Message-----

From: Brooks, Patrick J.  
Sent: Thursday, June 29, 2006 5:08 PM  
To: Jason.Barbeau@usdoj.gov; Winters, Karen  
Subject: FW: Exhibit B

Karen:

I'm on call with Jason and he was not aware that MI is done. You two should touch base.

-----Original Message-----

From: Robert Reichel [mailto:reichelb@michigan.gov]  
Sent: Thursday, June 29, 2006 4:09 PM  
To: wvawest@ameritech.net; Jonathan Pierce; Lewis Putman Jr.; Winters, Karen; ssamuels@ssd.com  
Cc: Paul.Harper@eaglepicher.com; Brooks, Patrick J.  
Subject: Re: Exhibit B

Thanks. The proposed revisions are acceptable with one minor exception. We request that the last sentence of the final bullet point under River Rouge Site Investigation be revised to read: "The number of sampling parameters for the future site investigation sampling may be reduced by agreement of the Custodial Trustee and the Lead Agency."

Please call me if you have any questions.

Robert P. Reichel  
Assistant Attorney General  
Environment, Natural Resources & Agriculture Division P. O. Box 30755  
Lansing, MI 48909 517-373-7540 (Phone) 517-373-1610 (Fax)

>>> "Winters, Karen" <KWinters@ssd.com> 6/29/2006 3:33:06 PM >>>  
Attached please find a revised draft of the Exhibit B forwarded to us yesterday by Brian Monroe with my suggested revisions to the document. The suggested revisions are reflected in track changes. Please let me know if these are acceptable and I will circulate an execution version of the Settlement Agreement and related exhibits. Thanks!

Karen A. Winters, Esq.  
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